#### **DOCKET SECTION**

## BEFORE THE POSTAL RATE COMMISSION

REGERVED FEB 26 4 20 PM 198

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

# ANSWER OF UNITED PARCEL SERVICE WITNESS KEVIN NEELS TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/UPS-ST1-1)

(February 26, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the response of UPS witness Kevin Neels to interrogatory OCA/UPS-ST1-1 of the Office of the Consumer Advocate.

Respectfully submitted,

John E. McKeever
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Attorneys for United Parcel Service

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Of Counsel.

#### ANSWER OF UNITED PARCEL SERVICE WITNESS NEELS TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/UPS-ST1-1. On page 3, line 15, of your supplemental testimony you provide the formula for the F statistic.

- a. Please provide a citation for the formula.
- b. In the denominator you have the expression (T-kn-n). Is this expression correct or is there a typographical error?

#### Response to OCA/UPS-ST1-1.

- a. See *Econometric Analysis* by William H. Greene, Third Edition, Section 7.4, for a discussion of the basic principles.
- b. The formula is basically correct. The unrestricted model attempts to estimate k+1 coefficients for each of n sites. The actual number estimated is somewhat less because of the necessity of dropping variables from the site-specific models in those cases where the data series for a site covers only one of the time periods flagged by Bradley's time trend variables. The degrees of freedom have been adjusted to account for such cases.

### **DECLARATION**

I, Kevin Neels, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Kevin Neels

Dated: February 26, 1998

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

John E. McKeever

Dated: February 26, 1998

Philadelphia, PA